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[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

APR 11 2025

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

MN

Numan Numan

Plaintiff(s),

vs.

Dennis Frank

Roosevelt University

Defendant(s).

Case No.

25-cv-03968
Judge Thomas M. Durkin
Magistrate Judge Daniel P. McLaughlin
Random Cat 2

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Numan Numan.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Dennis Frank, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)
_____ or

☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about _____, at approximately _____ ☐ a.m. ☐ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
_____, in the County of _____,
State of Illinois, at _____,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

Roosevelt University

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: ***(Leave blank if no custom or policy is alleged)***: _____

_____.

8. Plaintiff was charged with one or more crimes, specifically:

_____.

9. ***(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")*** The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- _____
_____.
- ☐ Other: _____.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Plaintiff alleges, that the defendant (Dennis Frank) retaliated against him after "he just wrote an initial letter of his concerns of not having his hours count toward graduation and being treated harshly and unfairly by Dennis Frank and staff." Plaintiff Nunn was asked to take classes that he already passed that's were retaliation comes in. Plaintiff was then kicked out of the program and giving a failing grade due to just this letter I sent. Defendants have no proof of me being a bad student I had honors. Defendant Roosevelt sided with Dr. Dennis Frank without properly investigating it.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Plaintiff was kicked out of school (Roosevelt University) and did not obtain his Counseling degree.

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: 

Plaintiff's name (print clearly or type): Numan Nunn

Plaintiff's mailing address: 9855 S. Ingleside Ave

City Chicago State IL ZIP

Plaintiff's telephone number: (773) 983-4673

Plaintiff's email address (if you prefer to be contacted by email): numannunn@yahoo.com

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

initial Letter of my issue

Dear President Ali Malekzadeh,

My name is Numan Nunn and I am a Clinical Mental Health Counseling student here at Roosevelt. I am writing this letter, because I believe I am being treated unfairly by my program's Counseling faculty. I have experienced isolation through their actions and find this to be unethical by Roosevelt and human standards. This behavior towards me has started to unravel into something that has lost control and is so clear and intense at this point that it has caused me to write this letter. I also want this letter to help enforce immediate action, to keep for my records and to share what has been going on as well as to ensure I Graduate—since I do not know that the faculty will do what I believe is right regarding graduation requirements.

What I would like to express is the hardships I have been experiencing throughout the counseling internship journey and the lack of support from the faculty. One thing that has remained clear is that the faculty has not been listening to me in our status meetings. They blame me personally for not having enough clients, however it's the approved sites that don't have clients for me to counsel. This "blame game" has been persistent and has no basis as these sites are sites *they* verified as locations for me to counsel to meet my counseling requirements and hours. Because these were approved and verified sites, I trusted they would equip me with what I needed to fulfill my requirements, but they did not and that is out of my hands – a concept the faculty is not understanding and has subsequently caused a lot of stress for me as a student at Roosevelt.

My first two counseling sites did not provide me with the clients/hours I needed, especially Olive Harvey Junior College. I felt misled by the college, as they set a precedence that I would have several clients to work with, which was not at all the case. In fact, they were the one college across the city that experienced an extreme lack of clients, which I later learned had been a problem for years – a valuable piece of knowledge my Director also knew but for some reason did not share this vital piece of information with me when it came to selecting the site.

The second site, following the college, was the Salvation Army. This was recommended by another student and had appeared to be promising. However, even though there were clients at this site, the Supervisor refused to give us access to them, which again did not help me in

fulfilling my program requirements and furthermore went against the internship contract they signed. Needless to say, my site exploration has been rough. Additionally, Dr. Frank, the site coordinator and individual over the counseling program, “vetted” both sites and approved them as verified internship sites. My two classmates and I felt completely deceived by this site and it caused another complete waste of time.

With all of these unfortunate circumstances, I am still optimistic about graduating with a Counseling degree and I believe it is attainable with my current internship site Ada S. McKinley. However, it has been disheartening to have status meetings with my counseling faculty (Dr. Frank (primarily), Dr. Connor, Dr. Heard and Dr. Peterson) listening to them blame me for everything and the outcomes of things that were out of my control. There are two parts to this in this situation, the internship site and the student. I take full responsibility for settling on the problematic sites, which had initially demonstrated great promise when I applied, but no one can truly foresee how many clients a site has unless the internship staff discloses that information. They had a lack of clients months in, and unfortunately caused me to lose out on valuable time towards fulfilling my hours. In addition, Covid surfaced at the same time the internship started in 2020, in the heart of the pandemic, which threw in unforeseeable variables and aided in an even more lack of clients.

I simply have no hand in how many clients a site has or how they operate. All I can do is perform my internship tasks and eventually make the decision to leave if the site is not fulfilling their site potential—but before you can do that, you have to do your due diligence and report to the site for weeks or months to see if the site can be successful in providing clients.

I was transparent with Dr. Frank during my first internship at Olive Harvey College of Fall 2020 in group internship supervision, notifying him of what was occurring every step of the way, and at the time, he was trying to work out a plan with Olive Harvey’s Site Supervisor and Director (who were essentially making excuses for the site not having clients). Due to his plan, I remained there from Aug ‘20- May ‘21, seeing a few clients but not enough for graduation. The site didn’t even want to sign off on my hours, which I shared with Dr. Frank in Fall 2020, and he said he would handle it. Now I am learning that it was never really handled, because now Dr.

Frank is bringing up those said hours, saying that they were not signed off, which I explained to him back in Fall 2020. I explained to him back in that time that my site Supervisor was not doing his job of signing off on my direct client hours which were completely legitimate. I am not understanding why something I brought up to him at the time of its occurrence, which he said he would handle, is now the same thing he is trying to hold against me.

I also explained to Dr. Frank that I kept him abreast every step of the way of all issues that I was experiencing, and he responded with affirmation. However, these status meetings have gotten to a point where we no longer focus on status and I am not experiencing any support, only a back-and-forth confrontational session where the finger is being pointed at me. I don't look forward to these meetings as they have caused great stress and difficulty focusing on my internship goals. I have provided them with my site Supervisor's information so they can call to verify my hours, yet they have not done this and continue to make it seem like I have not been doing what I am supposed to be doing to meet my requirements, which is completely false. Considering the nature of this program, you would think they would be understanding and provide healthy, thoughtful support to their student, but I am experiencing quite the opposite—seems pretty hypocritical since they are guiding me on how to counsel, yet I do not feel like they are actually listening to me. When I go to the meetings, it's as though they are looking for verbal confrontation—very unprofessional and provides no benefits to my success.

Instead of figuring out an action plan for me to graduate, I am experiencing Dr. Frank visually demonstrating anger towards me and persistent blame. They make claims that I am not putting forth effort, which I have found to be very offensive since I make myself available 5 days a week to counsel at my current site. It's discouraging and disrespectful to hear such words when you as the student is really trying. To have Dr. Frank and the faculty continuously blame and not want to count the hours I worked for and acquired because of a submission issue in Tevara, which is a *new* hours operating system that everyone is still learning, feels like a slap in the face. This is not beneficial when you are putting your time and genuine effort into graduation and especially for counseling. It's ironic these professors/faculty at Roosevelt have taught me to listen, have patience and empathy for others throughout the 4 years at Roosevelt and none of

these things are really echoed in these meetings, rather they are a back and forth that I no longer want to be a part of.

I also want to add that I had been searching diligently, and explored every lead Dr. Frank, Dr. Connor and the faculty had suggested but with no success. This to say, I have done my due diligence in looking, it has just been the luck of the draw for me with dysfunctional sites.

The tone of these status meetings with faculty have been unprofessional, non-productive and basically faculty saying that I am being untruthful about everything, however all information I provide can be verified. I'm not paying for a degree from Roosevelt to have what feels like childish back and forth with faculty. We should be following the facts which is what these status meetings should be based on. The fact of the matter remains that I did not have the clients that had seemed to be promised to me at my initial sites, which ate up a lot of my time towards obtaining direct hours. With this current site, Ada S. McKinley, we had a late start, and it took two months just to get clients due to background checks that we weren't told about initially—again, a site issue and not anything I could control.

My desire continues to be to graduate with a Counseling degree and I think even with this unforeseen luck with sites, I can still get the hours I need at my current site, Ada S. McKinley, to graduate. However, another factor that prompted me to send this letter was my recent interaction with Dr. Heard at this last meeting. Despite my 4 years put in towards obtaining this degree in counseling, Dr. Heard was pushing for me to get a Master's in Human Resources. I expressed that I was not interested in a Human Resources degree, but he kept pushing and talking about it. I simply did not sign up for a Human Resources degree, it is not what I want, not what I am paying for and not what I will accept. But it also confirms that I am being completely unheard and disregarded. When I mentioned Dr. Frank will have to verify my hours at the site and override the submitting of weekly hours for 2020 (since he facilitates and manages Tevara) so I can continue towards my path towards my counseling degree, Dr. Heard continued to push this human resource degree and gave me 2 weeks to figure out the submitting of hours issue when it really is a faculty verification issue. For Dr. Heard to threaten to give me a Human Resources Degree, if I don't figure out this issue in 2 weeks, is

unwarranted, especially when all of this was spelled out for Dr. Frank. Nothing about this is ethical and should not be associated with how Roosevelt operates with their students.

At this point, I feel as though I am being bullied and threatened in these meetings by faculty, who are also not even putting minimum effort into investigating and verifying the hours that I have worked for. Not to mention, I am giving them the means to verify all of this information, but yet they claim this is all on me. It appears they are taking a lazier route in facilitating the verification, which is causing me to not have all my internship hours that I performed at those sites, over 800 indirect and 130 direct, count towards my degree. The faculty is also now suddenly saying they want to be in our counseling sessions with our clients. I could understand if this was a coaching tactic they used all along for all students, but this is not something that all students had to go through –this is something implemented by Dr. Peterson for the remaining 3 students, which makes me feel isolated and a continuation of unfair treatment.

Due to this unfair treatment, I am willing to take legal action in order to graduate from Roosevelt and to count the hours that I did work for. This was never my intention—but I simply want to graduate with a master's in counseling and the program faculty is making it nearly impossible for me to succeed. I have experienced isolation, discrimination, threats, bullying, been met with confrontation and claims that I am not being truthful about matters that can be verified. My feelings throughout these experiences are valid and are meant to be heard.

I appreciate you considering my concerns as I believe this letter is necessary to acknowledge this unfortunate experience and faculties actions on things that may routinely happen in the future.

Best,

Numan Nunn

Retaliation

Dear Mr. Nunn (900399684),

The Department of Counselor Education faculty have considered all the information presented during your Student Performance Review on Thursday, January 13, 2022, including the submitted video recordings of your clinical work, the documentation submitted on Tevera, and your self-reports to University Supervisors over the past five semesters. When viewed in total, we have significant concerns related to your knowledge and application of theory, therapeutic skills, clinical techniques, and use of supervision.

In order to address the identified competency deficiencies, the faculty have constructed a developmental remediation plan to assist you to grow clinically and to gain the competence necessary to successfully complete your clinical internship and matriculate through the Counseling program. The remediation plan includes the following requirements:

- You must immediately begin the process of termination and/or transfer of all current clients and resign from your internship with Dr. Corey Dabney. This should be done as soon as clinically appropriate however it must be completed no later than Tuesday, February 1, 2022.
- We will accept the verified hours you obtained while interning at Olive-Harvey Wellness Center. However, at this time we will not accept any hours obtained during your internship at the Salvation Army or Ada S. McKinley. The process to have hours accepted from either site includes:
 - The submission of a new weekly time log for each week of clinical practice, covering a period of no more than seven consecutive days, that identifies the number and category of direct and indirect hours obtained during that week.
 - Each weekly time log must also be accompanied by a document that lists each direct hour reported during the week, the initials of the client seen during that session, the scheduled time and length of the session, and a sentence that describes what was worked on or addressed during that session.
- You must register for, retake, and successfully complete CHS 462 Pre-Practicum II – Advanced Skills.
 - The class meets on Thursdays from 5:00-7:30 beginning 1/20/22 and will be taught by Dr. Peterson.
 - Successful completion CHS 462 requires that you receive a minimum of at least a “3” on the Counselor Competency Scale-Revised.
- After successfully completing CHS 462, you will register for, retake, and successfully complete CHS 463 Clinical Mental Health Practicum.
- After successfully completing CHS 463, you will register for, retake, and successfully complete at least one semester of CHS 599.

If you accept this plan, please contact Dr. Frank no later than January 21, 2022 to enter into the remediation agreement. Your compliance with and learning throughout will be monitored, and you will be requested to meet with the faculty at least once per semester in order to evaluate your personal and professional growth during this process. If you are unsuccessful or choose not to complete any portion of the remediation plan, you will not be permitted to continue your clinical experiences or to continue in the Clinical Mental Health Counseling program and will be immediately referred for a Master’s degree in Human Services.

Sincerely,

The Department of Counselor Education core faculty Drs. Frank, Peterson, Heard & Conner

taking
classes
I passed
already

COUNSELING ACADEMIC AND PROFESSIONAL HONOR SOCIETY INTERNATIONAL

I was
a member
Student

Chi Sigma Iota

Member, Association of



College Honor Societies

Certificate of Membership presented to

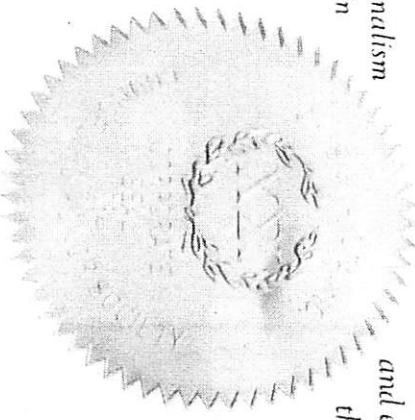
Suman Sum

of

Roosevelt University
Rho Chi Alpha Chapter

in recognition of scholastic and professional excellence

Mission: To promote scholarship, research, professionalism
in the pursuit of academic and clinical excellence in
and excellence in counseling, and to recognize high attainment
the profession of counseling and counselor education.



[Signature]
Chief Executive Officer
57894941

Certificate Number

[Signature]
President
3/29/2019
Date



Cook County Law Library <cookcountylawlibrary@gmail.com>

Fw: Termination of NNunn's Internship

1 message

Numan Nunn <numannunn@yahoo.com>

Mon, Aug 19, 2024 at 3:06 PM

To: "cookcountylawlibrary@gmail.com" <cookcountylawlibrary@gmail.com>

*Internship Supervisor Email of
my Character*

----- Forwarded Message -----

From: Corey Dabney <corey.dabney@dbhhc.org>

To: Numan Nunn <numannunn@yahoo.com>

Sent: Wednesday, January 26, 2022 at 03:52:51 PM CST

Subject: Fwd: Re: Termination of NNunn's Internship

----- Original Message -----

From: Corey Dabney <corey.dabney@dbhhc.org>

To: Dennis Frank <dfrank@roosevelt.edu>

Cc: Kristina Peterson-Thomas <kpeterson@roosevelt.edu>

Date: January 25, 2022 2:56 PM

Subject: Re: Termination of NNunn's Internship

Hi Dr. Frank,

Thanks for the updated I will work to get Numan's client's transferred. It was my pleasure to serve your student.

I have some concerns as it relates to your other two students. Brande's been sick, and Cynthia is off to a slow start with some of the clients declining services or no shows and me assigning new clients, with both having full-time jobs. It is unclear how they will achieve the required hours in the time allotted. Numan took every opportunity I gave him to see client's even taking weeks off front his full-time job to complete his hours. I don't want to waste the other students time if they're not going to be able to successfully complete. It would help me to see a plan that takes into account the students availability. It would help me greatly in assigning workloads. Both students are putting forth the effort just need a clear plan.

Thanks,
Corey

On January 25, 2022 2:17 PM Dennis Frank <dfrank@roosevelt.edu> wrote:

Hello Dr. Dabny,

I am writing to inform you the Counseling Faculty at Roosevelt University have met and reviewed Numan Nunn's progress through the clinical mental health counseling internship. At this point it has been decided that he may not continue with his internship, and he was informed last week that he must terminate or transfer his clients by February 1, 2022.

We would like to thank you for all the work that you have done to support Numan throughout his time working under your supervision. If you have any